

## REMARKS

Claims 1-14 are pending.

### Objection to the Drawings

In paragraph 2 the drawings were objected to as being informal. Formal drawings are submitted herewith. Therefore, Applicant believes that the objection to the drawings has been overcome.

### 103(a) Rejections

#### Claims 1-14

In paragraph 3 of the Office Action, Claims 1-14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over US Patent No. 6,405,027 by Bell et al. (referred to hereinafter as “Bell”) in view of US Patent No. 6,603,744 by Mitzutani (referred to hereinafter as “Mitzutani”). The Applicants have reviewed the cited references and respectfully submit that the present invention as recited in Claims 1-14 is neither taught nor suggested by Bell nor Mitzutani, alone or in combination.

Independent Claim 1 recites, “A system for changing operation mode of a first communication interface of a first device in communication with a second device, comprising:

a communication activator external to the first device to send a trigger signal when an external third device wants to communicate with the first device via the first interface;

a second communication interface inside the first device to receive the trigger signal; and

an operation mode control module coupled to the first and second interfaces to cause the first interface to change its operation mode in order to communicate with the third device when the second interface receives the trigger signal.”

Applicants respectfully assert that Bell does not teach or suggest such a system as recited by independent Claim 1. For example referring to FIG. 1A, Bell teaches a “group call combining means” that resides in a “Bluetooth

enabled mobile cellular or PCS or cordless handset” that coordinates calls between communications devices, such as D2-Dn. Among other things, Bell does not teach a “first communication interface of a first device” and “a second communication interface that is inside the first device,” as recited by Claim 1. Therefore, it is respectfully submitted that Bell cannot teach any of the limitations of Claim 1 since all of the limitations recited by Claim 1 refer to the first and/or the second communications interfaces.

Further, the cited combination also fails to teach or suggest the limitations of Claim 1 because Mizutani fails to remedy the deficiencies in Bell in that Mizutani fails to teach or suggest any of the limitations as recited by Claim 1. For example, Mizutani teaches methods to allow wireless communications between devices, like a mouse, to communicate with a computer by converting USB packets into wireless signals and vice versa. Mizutani does not teach communications between more than two devices due to the nature of the type of problem that Mizutani is attempting to solve. For example, if a user moves a wireless mouse, the user would only want the cursor displayed on the computer screen to respond. If another action resulted due to moving the mouse in addition to the cursor moving, this would cause problems.

Therefore, Mizutani cannot teach “a communication activator external to the first device to send a trigger signal when an external third device wants to communicate with the first device via the first interface.” Further “a second communication interface inside the first device to receive the trigger signal” refers to “the trigger signal” which is previously defined in Claim 1 as being sent “... when an external third device wants to communicate ...” Therefore, Mizutani cannot teach or suggest “a second communication interface inside the first device to receive the trigger signal.”

The Office action states that “a communication activator external to the first device to send a trigger signal when an external third device wants to communicate with the first device via the first interface,” as recited by Claim 1 is taught by Mizutani at Col. 14, lines 19-39. However, Mizutani makes no reference to an external third device at Col. 14, lines 19-39. Therefore, Mizutani does not teach or suggest “a communication activator external to the first

device to send a trigger signal when an external third device wants to communicate with the first device via the first interface” at Col. 14, lines 19-39.

The Office Action states that “a second communication interface inside the first device to receive the trigger signal,” as recited by Claim 1 is taught by Mizutani at Col. 16, lines 17-43. However, as already stated “a second communication interface inside the first device to receive the trigger signal” refers to “the trigger signal” which is previously defined in Claim 1 as being sent “... when an external third device wants to communicate ...” and Mizutani makes no reference to an “external third device” at Col. 16, lines 17-43. Therefore, Mizutani does not teach or suggest “a second communication interface inside the first device to receive the trigger signal” as Col. 16, lines 17-43.

The Office Action does not state that Mizutani teaches or suggests “an operation mode control module coupled to the first and second interfaces to cause the first interface to change its operation mode in order to communicate with the third device when the second interface receives the trigger signal.” Applicants respectfully agree with the Office Action in this regard. Therefore, it is respectfully submitted that Mizutani does not teach any of the limitations as recited by Claim 1. For the foregoing rationale, none of the limitations of Claim 1 are taught or suggested by either Bell or Mizutani, alone or in combination.

Independent Claim 8 should be allowed for similar reasons that independent Claim 1 should be allowed. Claims 2-7 depend on Claim 1, which is believed to be allowable for the foregoing rationale. As such, it is respectfully asserted that the rejections of Claims 2-7 have been overcome and their allowance is earnestly solicited. Claims 9-14 depend on Claim 8, which is believed to be allowable for the foregoing rationale. As such, it is respectfully asserted that the rejections of Claims 9-14 have been overcome and their allowance is earnestly solicited.

In paragraph 4 of the Office Action, Claims 7 and 14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Bell in view of Mizutani and further in view of US Patent No. 6,797,519 by Cohen et al. (referred to

hereinafter as "Cohen"). The Applicants have reviewed the cited references and respectfully submit that the present invention as recited in Claims 7 and 14 is neither taught nor suggested by Bell, Mitzutani, nor Cohen alone or in combination.

The Office Action did not claim that Cohen taught or suggested the limitations recited by either Claim 1 or 8. Applicants respectfully agree with the Office Action in this regard. Since Claims 7 and 14 depend on Claims 1 and 8 respectfully and recite additional limitations which make them patentable, Applicant respectfully submits that the rejection of Claims 7 and 14 has been overcome and their allowance is earnestly solicited.

Conclusions

In light of the above remarks, Applicants respectfully request reconsideration of the rejected claims.

Based on the arguments presented above, Applicants respectfully assert that Claims 1-14 overcome the rejections of record and, therefore, Applicants respectfully solicit allowance of these claims.

Applicants have reviewed the references that the Office Action cited but did not rely upon and respectfully submit that these references neither teach nor suggest the claimed invention.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,  
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